

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA**

LAKESHIA AARON

Plaintiff,

v.

TERESA L. FERRELL

Defendant.

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2:23-cv-374-MHT-CWB

MOTION TO WITHDRAW

Attorney Amardo Wesley Pitters, counsel for the plaintiff and moves this Court to withdraw from further representation whereas the plaintiff has failed to respond to correspondences and telephone call and communication from counsel and the office of the undersigned counsel regarding her defense of this cause, including, but not limited to, the conducting of discovery. Certified mail to the plaintiff's residence and mailing address on file has been returned. Indeed, responses have come due to the plaintiff's written discovery. The plaintiff has responded to the defendant's written discovery and the undersigned counsel has issues with the same but cannot file a motion to compel without first addressing these issues with the defendant. There is also the need for the undersigned counsel to take the plaintiff's deposition. Presumably counsel for the plaintiff may want to take the defendant's deposition. The undersigned counsel submits that the defendant cannot be located, and counsel has exhausted all efforts at contacting the defendant in furtherance of his defense in the above-styled cause. The undersigned counsel for plaintiff is leaving for several days from the practice of law due to counsel's father, Herbert Wesley Pitters, age 83, having been hospitalized in ICU having suffered an initial stroke over the weekend and a subsequently second stroke yesterday that warranted emergency surgery pursuant to CT Scan revealing

two blood clots, according to representations from his treating healthcare providers to the Pitters family, resulting neurological damage, etc. This is a life and death situation warranting counsel getting away from the practice of law to being with his family in this time of tragic circumstances. The undersigned counsel's absence may impede his ability to respond to any adverse motion filed by the plaintiff regarding outstanding discovery. However, the truth of the matter is that counsel's client has left him with no other recourse but to file this motion to withdraw before his departure to be with family. A copy of this motion is being mailed to the last known address for the defendant as exists on file with the undersigned counsel's office.

Respectfully submitted,

/s/ Amardo Wesley Pitters
Amardo Wesley Pitters, Esquire
Attorney for the Defendant
Attorney Bar Code: 8998-T64A

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of June, 2024, a copy of the foregoing was duly served upon the following:

*Joseph W. Weeks, Esquire
125 Clairemont Avenue, Suite 450
Decatur, Georgia 30030*

by efile.

**/s/ Amardo Wesley Pitters
Amardo Wesley Pitters, Esquire**